

EXHIBIT 2

From: [Gillis, James P. \(USAVAE\)](#)
To: [MacDougall, Mark](#); [Trout, Robert \(External\)](#)
Cc: [Gibbs, John \(USAVAE\)](#); [Turgeon, Evan \(NSD\) \(JMD\)](#)
Subject: United States v. Rafiekian
Date: Friday, January 25, 2019 9:49:21 AM

****EXTERNAL Email****

Dear Bob and Mark,

I have your letter of January 18, 2019. Our responses correspond to the numbered paragraphs in your letter.

1. We will comply with all of our Rule 16 obligations.
2. This request is for information not relevant to this prosecution and is, in any event, overbroad. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
3. This request is for information not relevant to this prosecution. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
4. This request is for information not relevant to this prosecution and is, in any event, overbroad. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
5. This request is for information not relevant to this prosecution and is, in any event, overbroad. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
6. We will comply with all of our Rule 16 obligations.
7. This request is overbroad. It can hardly be contested that the Turkish government sought the extradition of Gulen or that the United States did not extradite him. I will request that our Office of international Affairs assemble the requests themselves and the U.S. government's responses to the Turkish government. I will also ask OIA to search its files for mention of Gen. Flynn, Rafiekian, Alptekin, or Inovo in connection with the extradition requests.
8. This request is for information not relevant to this prosecution.
9. This request is for information not relevant to this prosecution.
10. This request is beyond the scope of our discovery obligations. Nonetheless, we have made a number of the 302s related to this investigation available for your review and, as we've discussed, are prepared to make all of them available upon certain conditions. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
11. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
12. This request is for information not relevant to this prosecution since the indictment does not charge nor mention a failure to file under FARA. Nonetheless, I believe that this information

has been and will be included in our discovery productions. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.

13. This information has been and will be included in our discovery productions.
14. This request is for information not relevant to this prosecution.
15. I do intend to produce what I consider to be the core documents. This, of course, represents my own work product and that of others on the prosecution team, and we are producing them despite any obligation to do so. The government shutdown has continued to hamper our efforts to compile clean copies of these, but I hope to be able to produce them today or Monday. There will also be approximately eight DVDs that we will produce containing the productions received from FIG, Alptekin, and others. Although these may have been produced in the original batch, I believe that these will be easier for you to review. This project, too, has been affected by the furlough of our support staff. Still, we are making every effort to produce these documents, and we are not waiting for the shutdown to end before doing so.
16. We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.
17. (and 18) We will of course comply with all of our Brady, Giglio, Jencks, and Rule 16 obligations.

In complying with our discovery obligations, we are aware of our obligation to make reasonable inquiry with those who may be considered part of the prosecution team.

Best regards,

Jim

James P. Gillis
Assistant United States Attorney
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